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Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of

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MM DOCKET NO.

92-16

RM

7887

Amendment of Section 73.202(b),  
Table of Allotments, FM Broadcast  
Station (Hazelhurst, Jeffersonville,  
Soperton and Tennille, Georgia)

TO: Chief, Allocations Branch  
Policy and Rules Division  
Mass Media Bureau

**JOINT PETITION FOR RULEMAKING**

Jeff Davis Broadcasters, Inc. ("Jeff Davis"), ALP Limited Partnership ("ALP") and Wesley James Holden ("Holden") hereby jointly petition the Commission to initiate rulemaking proceedings proposing amendment of the Table of Allotments for FM Broadcast Stations (47 C.F.R. §75.202(b)) in the following manner.

<u>Community</u>	<u>Channel</u>	
	<u>Present</u>	<u>Proposed</u>
Hazelhurst, GA	228A	228C2
Jeffersonville, GA	229A	229C2
Mt. Vernon, GA		269A
Sandersville, GA	228A	260A
Soperton, GA	269A	291A
Tennille, GA	260A	270A

In support whereof, the following is shown.

1. Petitioner Jeff Davis, the licensee of Station WVOH-FM, Hazelhurst, Georgia, requests an upgrade of WVOH's facilities from Class A to Class C-2 on Channel 228.

Petitioner ALP, the permittee of Station WWST, Jefferson, Georgia, requests an upgrade of WWST's facilities from Class A to Class C-2 on Channel 229. Petitioner Holden, a resident of McRae, Georgia, requests allotment of Channel 269A to Mount Vernon, Georgia, as that community's first FM allotment so that he may file an application for a new station on the channel.

2. Joint Petitioners filed a petition requesting the same changes in the FM Table of Allotments on May 15, 1991. However, by letter to counsel for Jeff Davis dated June 28, 1991, the Chief of the Allocations Branch returned the petition after finding it to be unacceptable because in order to make the changes in allotments it would be necessary to substitute Channel 291A for Channel 269A at Soperton, Georgia at the site licensed to Station WKTM-FM. The Commission's letter pointed out that allotment of Channel 291A to Soperton at WKTM's site would be short-spaced to the site proposed in a construction permit for Station WFXH(FM), Channel 291C2, Hilton Head, South Carolina. A copy of the Commission's letter is attached hereto as Exhibit A.

3. In order to cure the short-spacing problems noted in the Commission's letter, this petition proposes that Channel 291A be allotted to Soperton at a different site (32° 23' 19" NL 82° 42' 13" WL) which meets all of the mileage separation requirements of the Commission's Rules. See attached Engineering Exhibit, pages 2-3, 9 and Fig. 4. Joint Petitioners recognize that while the Commission does not usually require a station such as WKTM-FM, Soperton, Georgia, to change its transmitter site in order to accommodate changes in channel allotments, the Commission will make such a change when the affected station consents. See Batesburg, et al. South Carolina, 55 RR2d 752 (MM Bur. 1983).

Petitioner ALP has entered into the agreement attached hereto as Exhibit B with SOL Broadcasting, Inc. ("SOL"), licensee of WKTm, pursuant to which SOL has agreed to accept geographic coordinates for the allotment of Channel 281A to Soperton, Georgia which are different from its existing transmitter site in order to accommodate ALP's request to upgrade WWST's channel assignment at Jeffersonville to Class C2 stations. The attached Engineering Statement demonstrates that Channel 291A can be allotted to Soperton for use by WKTm at a variety of sites from which all of the Commission's mileage separation and service requirements can be met.

4. The attached Engineering Exhibit also demonstrates that each of the other requested channel allotments can be accomplished in full compliance with the Commission's mileage separation and community service requirement rules if the proposed substitutions for existing allotments at Sandersville and Tennille are also made; specifically, Joint Petitioners, request that: the existing allotment of Channel 228A at Sandersville, Georgia be changed to Channel 260A; the existing allotment of Channel 269A at Soperton, Georgia be changed to Channel 291A; and the existing allotment of Channel 260A at Tennille, Georgia be changed to Channel 270A.

5. The existing Channel 228A allotment at Sandersville is currently used by Station WSNT which operates with 3Kw of power and is prohibited from increasing power to the 6 kw maximum permitted by the Commission's Rules because it is short-spaced to the site specified in Petitioner ALP's Construction Permit for Station WWST on first adjacent Channel 229A at Jeffersonville, Georgia. As demonstrated in the attached Engineering Exhibit, the Channel 260A allotment at Sandersville proposed herein would meet all of the

mileage separation requirements of the Commission's Rules for a station operating on the Channel at WSNT's present transmitter site, and would permit WSNT to increase its power to the maximum 6kw permitted by the Commission's Rules.

6. The existing Channel 260A allotment at Tennille is vacant, but two mutually-exclusive applications have been filed for a new station on the channel. While the Channel 270A allotment at Tennille proposed herein could not be used at either of the transmitter sites proposed in the two applications, the attached Engineering Exhibit demonstrates that said channel could be used by a Tennille station at transmitter sites located throughout a large area.

7. The public interest benefits which would flow from the channel allotments proposed herein are substantial. Mount Vernon, an incorporated community with a 1980 population of 1,737 is the seat of Montgomery County, Georgia which has a population of 7,011. The Channel 269A allotment proposed herein would provide Mount Vernon and Montgomery County with their first local broadcast facility. Moreover, the proposed substitute allotments at Hazelhurst and Jeffersonville would permit stations on existing Class A channels to dramatically increase their service areas. Finally, the substitute Class A channels for Sandersville and Soperton would permit existing 3 kw stations to increase their power to 6 kw and provide additional service. These benefits can be accomplished without disturbing any existing service and without impinging on the rights of the applicants for the new station at Tennille, whose transmitting facilities have not yet been built.

8. Petitioners Jeff Davis and ALP represent to the Commission that in the event they are permitted to upgrade their authorized facilities from Class A to Class C-2 status, they will jointly reimburse the licensees of WSNT, Sandersville for the legitimate expenses incurred by it in making the channel change proposed herein. Petitioner ALP represents that it will fully comply with the provisions of the Agreement it has entered into with the licensee of WKTM-FM, Soperton, Georgia, as set forth in Exhibit B hereto. Said petitioners also represent that in the event the channels requested herein are allocated to their respective communities, they will apply for permission to construct new Class C2 facilities on said channels and will build such facilities upon receiving authorization from the Commission. Petitioner Holden represents that at such time as a channel is allotted to Mount Vernon, Georgia, he will file an application for a new station on said channel, and construct a new station therein if his application is granted.

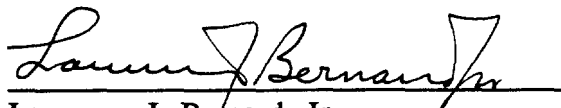
Accordingly, the Commission is respectfully requested to issue a Notice of Proposed Rulemaking proposing the changes in the Table of allotments for FM Broadcast stations described above.

Respectfully submitted,

JEFF DAVIS BROADCASTERS, INC.

By: Dennis F. Begley *by l.j.b.jr*  
Dennis F. Begley  
Reddy, Begley & Martin  
2033 M Street, N.W., Suite 500  
Washington, D.C. 20036  
(202) 659-5700  
Its Attorney

ALP LIMITED PARTNERSHIP and  
WESLEY JAMES HOLDEN

By:   
Lawrence J. Bernard, Jr.  
1300 19th Street, N.W.  
Suite 240  
Washington, D.C. 20036  
(202) 296-9005

December 17, 1991

Their Attorney

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554

JUN 28 1991

IN REPLY REFER TO:

Dennis F. Begley  
Reddy, Begley & Martin  
2033 M Street, N.W.  
Suite 500  
Washington, D.C. 20036


Dear Mr. Begley:

This is in response to the joint petition for rule making which you filed on behalf of Jeff Davis Broadcasters, Inc., ALP Limited Partnership, and Wesley James Holden. The petition requests the substitution of Channel 228C2 for Channel 228A at Hazelhurst, Georgia, and the modification of Station WVOH(FM)'s license accordingly; the substitution of Channel 229C2 for Channel 229A at Jeffersonville, Georgia, and the modification of Station WWST(FM)'s construction permit accordingly; the substitution of Channel 260A for Channel 228A at Sandersville, Georgia, and the modification of Station WSNT(FM)'s license accordingly; the substitution of Channel 291A for Channel 269A at Soperton, Georgia, and the modification of Station WKTM(FM)'s license accordingly; the substitution of Channel 270A for vacant but applied for Channel 260A at Tennille, Georgia; and the allotment of Channel 269A at Mt. Vernon, Georgia.

We have reviewed your request and find that it is unacceptable for consideration. The substitution of Channel 291A for Channel 269A at Soperton, Georgia, using the coordinates specified in your petition (32-25-31 and 82-33-26) is short-spaced to a construction permit for Station WFXH(FM), Channel 291C2, Hilton Head, South Carolina. As a result, the remaining substitutions and proposed allotments, which are dependent on the Soperton substitution, cannot be considered.

Accordingly, your request is hereby returned as unacceptable for further consideration.

Sincerely,



Andrew J. Rhodes  
Chief, Allocations Branch  
Policy and Rules Division  
Mass Media Bureau

Enclosures

cc: ✓ Lawrence J. Bernard, Jr.  
Sol Broadcasting, Inc.  
Radio Station WSNT, Inc.  
Lee M. Pierce, Sr.  
Broadcast Media Co.

## **AGREEMENT**

This Agreement is made by and between SOL Broadcasting, Inc. ("SOL"), licensee of radio station WKTM(FM), Soperton, Georgia and ALP Limited Partnership ("ALP"), permittee of radio station WWST(FM), Jefferson<sup>vill</sup>e, Georgia.

### **Recitals:**

ALP wishes to upgrade the facilities of WWST by changing its channel of operation from 229A to 229C2, and said change cannot be accomplished under the rules of the Federal Communications Commission ("FCC") unless the channel used by SOL's WKTM is changed from 269A to 291A. The proposed change in channels for WKTM would benefit SOL because WKTM's maximum power under the FCC's rules is now 3.0 kw, while it could operate with 6.0 kw if its channel is changed to 291A. However, under the FCC's policies, WKTM's channel cannot be changed without its consent because Channel 291A cannot be allotted WKTM's existing transmitter site under the FCC's rules for making channel changes.

### **Mutual Undertakings:**

In consideration of their mutual promises to each other, the receipt and sufficiency of which are hereby acknowledged, SOL and ALP hereby agree that:

1. SOL consents to a change by the FCC of WKTM's operating frequency from Channel 269A to 291A;



2. Within ten days following the issuance of a final FCC order authorizing a change in WWST's operating Channel to 229C2, ALP will pay SOL the sum of \$15,000.

3. Furthermore, in the event WKTm's effective radiated operating power can be increased from 3kw on Channel 291A merely by modifying the station's existing antenna, ALP agrees that at its own cost, it will purchase and install such additional antenna parts as may be necessary to effectuate a power increase for WKTm up to 6kw or such lesser maximum power as may be permitted by the FCC's rules and desired by SOL; provided however that this obligation shall not include the purchase, installation or modification of any items of equipment other than those necessary to change WKTm's existing antenna to effectuate higher power operation; i.e., without limiting the generality of the foregoing, ALP shall not be obligated to purchase or install a new <sup>FCS AP</sup> antenna, transmitter or transmission line or make any modification to any equipment other than the antenna now installed at WKTm.

4. SOL hereby agrees that ALP may file this Agreement with the FCC as evidence of SOL's consent to a change in the operating channel of WKTm from Channel 269A to 291A at a transmitter site other than that now specified in WKTm's FCC license. While the parties hereto do not contemplate that WKTm will be required to move from its existing transmitter site because the FCC's rules permit WKTm to obtain an authorization to operate from that location if it reduces its power below 6kw or <sup>FCS AP</sup> ~~proposes to directionalize its~~ ~~signal~~, in the event such a move is required by the FCC or undertaken voluntarily by SOL, the obligations of the parties hereto shall not be modified or changed in any respect.

In witness whereof, the parties hereto have executed this Agreement on the  
dates indicated below.

SOL BROADCASTING INC.

Date: 11/8/91

By: Fred L. Stalnaker, Jr.  
Fred L. Stalnaker, Jr.,  
President  
P.O. Box 314  
McRae, Ga. 31055

ALP LIMITED PARTNERSHIP

Date: 11/8/91

By: Alton L. Parker, Jr.  
Alton L. Parker,  
General Partner

A JOINT PETITION FOR RULE MAKING  
BY  
WESLEY JAMES HOLDEN  
JEFF DAVIS BROADCASTERS, INCORPORATED  
ALP LIMITED PARTNERSHIP

ENGINEERING EXHIBIT

AUGUST 1991

William Culpepper & Associates, Inc.  
227 Farr's Bridge Road  
Greenville, South Carolina 29611

A JOINT PETITION FOR RULE MAKING  
WESLEY JAMES HOLDEN  
JEFF DAVIS BROADCASTERS, INCORPORATED  
ALP LIMITED PARTNERSHIP  
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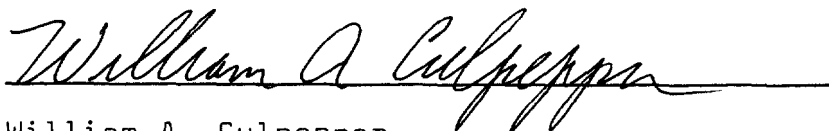
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A JOINT PETITION FOR RULE MAKING

DECLARATION

I declare, under penalty of perjury, that I have prepared the attached Exhibit for Wesley James Holden, Jeff Davis Broadcasters, Incorporated and ALP Limited Partnership, and that all of the facts therein, except for facts of which the Federal Communications Commission may take official notice, are true to the best of my knowledge and belief; and that I am a Registered Professional Engineer in the State of Georgia.

Executed on August 26, 1991

A handwritten signature in cursive script, reading "William A. Culpepper", is written over a solid horizontal line.

William A. Culpepper  
227 Farr's Bridge Road  
Greenville, South Carolina 29611  
803-246-3401

## NARRATIVE

This Exhibit has been prepared in support of a joint Petition by Wesley James Holden, Petitioner for the allotment of Channel 269A to Mt. Vernon, Georgia; Jeff Davis Broadcasters, Incorporated, Licensee of WVDH-FM, Channel 228A, Hazlehurst, Georgia; and by ALP Limited Partnership, Permittee of WWST, Channel 229A, Jeffersonville, Georgia.

The purpose of the Petition is to request:

1. The allotment of Channel 269A to Mt. Vernon, Georgia.
2. The upgrade of the allotment at Hazlehurst from Channel 228A to Channel 228C2.
3. The upgrade of the allotment at Jeffersonville from Channel 229A to Channel 229C2.

To accommodate the above changes, it is necessary to make the following channel substitutions:

- A. Change the Channel of WKTM, Soperton, Georgia, from 269A to 291A.
- B. Change the Channel of WSNT, Sandersville, Georgia, from 228A to 260A.
- C. Change the allotment at Tennille, Georgia, from Channel 260A to Channel 270A.

WKTM at Soperton is a grandfathered short-spaced station that is short-spaced to WPPR, Channel 269A at Warner Robins, Georgia. The proposed substitution of Channel 291A for 269A for Soperton will require a new reference point for the allocation to protect the construction permit of WFXH, channel

291C2, at Hilton Head Island, South Carolina. A channel study, showing the reference coordinates, is included in this exhibit as page 9. A Usable Area Study is shown on the map of Figure 4. It is clear that the requirements of both §73.207 and §73.315 can be met over a large area, providing reasonable assurance of the availability of a suitable transmitter site. Substitution of channel 291A for channel 269A at Soperton will permit operation with full class A facilities.

WSNT at Sandersville is a grandfathered short-spaced station that is short-spaced to the authorized site of WWST, Channel 229A, Jeffersonville, Georgia. The proposed substitution of Channel 260A for Channel 228A at Sandersville will provide WSNT with a fully-spaced facility and permit operation with maximum class A facilities of 100 meters HAAT and six kilowatts non-directional at its present site.

Broadcast Media Company and Lee M. Pierce, Sr. have pending applications for a construction permit on Channel 260A at Tennille, Georgia. For Channel 270A, as proposed in this petition, both of their sites are short-spaced to WTHO, Channel 269A at Thomson, Georgia. (The allotment of Channel 269A to Mt. Vernon will not interfere with the substitution of Channel 270A for Channel 260A at Tennille.)

Figure 1 is a map which shows the Tennille corporate boundary and the area in which a Channel 270A transmitter site can be located. It is obvious from this study that there is a large area in which a potential site can meet the requirements

of both §73.207 and §73.315, providing reasonable assurance of the availability of a suitable transmitter site. The transmitter sites designated in the pending Tennille applications are merely a preference at this time.

Mt. Vernon, Georgia is an incorporated town that had a 1980 population of 1737, and it is the county seat of Montgomery County. There is no broadcast station in Montgomery County, and the allotment of channel 269A to Mt. Vernon will provide that community and the county with a first local broadcast service.

Page 6 is a Study for Channel 269A at Mt. Vernon. This study is based on the proposed substitution of Channel 291A for channel 269A at Soperton, and Channel 270A for channel 260A at the reference point for Tennille. Figure 3 is a map showing the Mt. Vernon city boundary and the Usable Area for Channel 269A. It is obvious that §73.207 and §73.315 can be satisfied over a large area, providing reasonable assurance that a suitable site will be available.

Page 7 is a Study for Channel 228C2 at Hazlehurst using the present coordinates of WVOH. As proposed in this petition, Channel 228A has been deleted at Sandersville, and Channel 229C2 has been substituted for Channel 229A at Jeffersonville.

Page 8 is a Study of Channel 229C2 for Jeffersonville at the reference site proposed in this petition. As proposed herein, Channel 228A has been deleted at Sandersville and WVOH is



shown at its present site as a class C2 facility. Also, Figure 2 is a Usable Area Study for Channel 229C2 at Jeffersonville which shows the Jeffersonville corporate boundary and the reference site. It is clearly demonstrated in the figure that the proposed C2 allotment for Jeffersonville will meet the requirements of both §73.207 and §73.315 over a large area, thus providing reasonable assurance of the availability of a suitable site.

Page 9 is a Study for Channel 291A at Soperton at the present site of WKTM.

Page 10 is a Study for Channel 260A at Sandersville at the present site of WSNT. For this Study, Channel 260A has been deleted at Tennille as proposed in this petition.

Page 11 is a Study for Channel 270A for Tennille conducted at the reference site proposed herein. Figure 1 is a Usable Area Study showing the corporate boundary of Tennille and the reference site. From the figure, it is obvious that there is a large area in which a transmitter site can meet the requirements of both §73.207 and §73.315, providing reasonable assurance of an available site.

The changes proposed in this petition are as follows:

CITY	PRESENT	PROPOSED
Mt. Vernon, GA	----	269A
Hazlehurst, GA	228A	228C2
Jeffersonville, GA	229A	229C2
Sandersville, GA	228A	260A

CITY	PRESENT	PROPOSED
Soperton, GA	269A	291A
Tennille, GA	260A	270A

The reference coordinates proposed for Mt. Vernon, Jeffersonville Soperton and Tennille are shown on the upper left of the Channel Studies. Studies for Hazlehurst and Sandersville were calculated from the existing transmitter sites of WVOH and WSNT.

WILLIAM CULPEPPER & ASSOCIATES. INC.  
227 FARR'S BRIDGE ROAD GREENVILLE SC 29611

PROPOSED CHANNEL ALLOTMENT  
MT. VERNON, GEORGIA

REFERENCE	CLASS A	DISPLAY DATES
32 11 09 N		DATA 02-28-91
82 31 11 W	Current rules spacings	SEARCH 04-03-91
----- CHANNEL 269 -101.7 MHz -----		

CALL	CH#	CITY	STATE	BEAR'	D-KM	R-KM	MARGIN
-----							
* WKTM	269A	Soperton	GA	352.4	26.79	115.0	-88.21
ALOPEN	267C2	Chauncey	GA	279.3	56.11	55.0	1.11
AP267	267C2	Chauncey	GA	279.7	56.94	55.0	1.94
WPPR	269A	Warner Robins	GA	295.4	116.95	115.0	1.95
WHJX	268C	Brunswick	GA	153.8	168.57	165.0	3.57
WHJX.C	268C	Brunswick	GA	153.8	168.58	165.0	3.58
AP267	267C2	Chauncey	GA	288.3	61.66	55.0	6.66
AP267	267C2	Chauncey	GA	282.1	64.05	55.0	9.05
** AD270	270A	Tennille	GA	338.9	81.26	72.0	9.26
WZAT	271C	Savannah	GA	97.2	112.33	95.0	17.33
WWFP.A	270A	Pearson	GA	203.3	99.44	72.0	27.44
WTHOFM	269A	Thomson	GA	0.1	142.69	115.0	27.69
ALOPEN	270A	Pearson	GA	199.1	104.65	72.0	32.65
ALOPEN	269C2	Ravenel	SC	74.7	207.19	166.0	41.19
WBAW	269A	Barnwell	SC	43.4	158.35	115.0	43.35
WMGL.A	269C2	Ravenel	SC	76.1	213.52	166.0	47.52
-----							

\* Substitution of Channel 291A for Channel 269A at Soperton is proposed in this petition.

\*\* Substitution of Channel 270A for Channel 260A at Tennille is proposed in this petition.

WILLIAM CULPEPPER & ASSOCIATES. INC.  
227 FARR'S BRIDGE ROAD GREENVILLE SC 29611

PROPOSED CHANNEL UPGRADE  
HAZLEHURST, GEORGIA

REFERENCE		DISPLAY DATES
31 51 15 N	CLASS C2	DATA 02-28-91
82 34 00 W	Current rules spacings	SEARCH 04-03-91
----- CHANNEL 228 - 93.5 MHz -----		

CALL	CH#	CITY	STATE	BEAR'	D-KM	R-KM	MARGIN
-----							
* DE228	228A	Hazlehurst	GA	0.0	0.00	166.0	-166.00
* AD229	229A	Hazlehurst	GA	0.0	0.00	106.0	-106.00
** WSNTFM	228A	Sandersville	GA	349.6	126.16	166.0	-39.84
AD229	229C2	Jeffersonville	GA	320.3	134.01	130.0	4.01
WDOGFM	228A	Allendale	SC	41.8	173.95	166.0	7.95
WCHYFM	231C	Savannah	GA	79.1	117.11	105.0	12.11
WKXHFM	282A	Alma	GA	175.9	27.45	15.0	12.45
AP282	282A	Alma	GA	175.9	27.45	15.0	12.45
ALOPEN	282A	Alma	GA	175.9	27.45	15.0	12.45
WWST.C	229A	Jeffersonville	GA	320.1	125.84	106.0	19.84
WRBX.C	281A	Reidsville	GA	58.0	48.72	15.0	33.72
WVFJFM	227C	Manchester	GA	299.6	222.60	188.0	34.60
WEASFM	226C1	Savannah	GA	79.6	117.85	79.0	38.85
WAIA	227C2	St. Marys	GA	146.1	173.30	130.0	43.30
AD228	228A	Perry	FL	206.7	215.98	166.0	49.98
-----							

\* DE228 and AD229 were part of the Hinesville, Georgia proceeding (Docket 87-403). WVOH, Hazlehurst, has been ordered to remain on Channel 228A.

\*\* Substitution of Channel 260A for Channel 228A at Sandersville is proposed in this petition.

WILLIAM CULPEPPER & ASSOCIATES. INC.  
227 FARR'S BRIDGE ROAD GREENVILLE SC 29611

PROPOSED CHANNEL UPGRADE  
JEFFERSONVILLE, GEORGIA

REFERENCE		DISPLAY DATES
32 47 00 N	CLASS C2	DATA 02-28-91
83 28 36 W	Current rules spacings	SEARCH 04-03-91
----- CHANNEL 229 - 93.7 MHz -----		

CALL	CH#	CITY	STATE	BEAR'	D-KM	R-KM	MARGIN
* WSNTFM	228A	Sandersville	GA	71.4	65.89	106.0	-40.11
** AD229	229A	Hazlehurst	GA	140.3	134.01	166.0	-31.99
WVFJFM	227C	Manchester	GA	273.6	107.63	105.0	2.63
WVOH	228C2	Hazlehurst	GA	140.3	134.01	130.0	4.01
WMTMFM	230C1	Moultrie	GA	189.6	176.36	158.0	18.36
WFBCFM	229C	Greenville	SC	17.3	270.48	249.0	21.48
WMTZ.C	230C3	Martinez	GA	53.3	138.96	117.0	21.96
WMTMFM	230C1	Moultrie	GA	188.1	180.71	158.0	22.71
WVOHFM	228A	Hazlehurst	GA	140.3	134.01	106.0	28.01
DE228	228A	Hazlehurst	GA	140.3	134.01	106.0	28.01
WSTR.C	231C	Smyrna	GA	323.5	134.63	105.0	29.63
AD226	226C3	Warrenton	GA	44.9	90.25	56.0	34.25
AD226	226C3	Warrenton	GA	37.9	95.35	56.0	39.35
AD232	232A	Gibson	GA	56.5	97.49	55.0	42.49

\* Substitution of Channel 260A for Channel 228A at Sandersville is proposed in this petition.

\*\* AD229 is part of the Hinesville, Georgia proceeding (Docket 87-403). WVOH, Hazlehurst, has been ordered to remain on Channel 228A.

WILLIAM CULPEPPER & ASSOCIATES. INC.  
227 FARR'S BRIDGE ROAD GREENVILLE SC 29611

AVAILABLE CHANNEL  
SOPERTON, GEORGIA

REFERENCE		DISPLAY DATES
32 23 19 N	CLASS A	DATA 08-07-91
82 42 13 W	Current rules spacings	SEARCH 08-25-91
CHANNEL 291 -106.1 MHz		

CALL	CH#	CITY	STATE	BEAR'	D-KM	R-KM	MARGIN
* WIML	292A	Wrightsville	GA	357.7	35.30	72.0	-36.70 *
WQBZ.C	292C2	Fort Valley	GA	292.7	106.22	106.0	0.22 <
WFXH.C	291C2	Hilton Head Island	SC	92.2	166.25	166.0	0.25 <
WKIGFM	292A	Glennville	GA	119.6	85.60	72.0	13.60
WFXH	291C2	Hilton Head Island	SC	97.9	184.51	166.0	18.51
WOKAFM	294C1	Douglas	GA	189.5	97.27	75.0	22.27
WDAXFM	237A	Mcrae	GA	202.5	39.82	10.0	29.82
CP291	291A	Sylvester	GA	229.8	151.83	115.0	36.83
WQBZ	292A	Fort Valley	GA	280.9	111.93	72.0	39.93
WZLI	291C	Toccoa	GA	344.3	269.73	226.0	43.73
WZNY.C	289C	Augusta	GA	35.3	140.19	95.0	45.19

\* WIML has moved to Channel 298A as ordered in Docket 88-221.

WILLIAM CULPEPPER & ASSOCIATES. INC.  
227 FARR'S BRIDGE ROAD GREENVILLE SC 29611

PROPOSED CHANNEL 260A SUBSTITUTION  
SANDERSVILLE, GEORGIA

REFERENCE	CLASS A	DISPLAY DATES
32 58 23 N		DATA 02-28-91
82 48 34 W	Current rules spacings	SEARCH 04-03-91
----- CHANNEL 260 - 99.9 MHz -----		

CALL	CH#	CITY	STATE	BEAR'	D-KM	R-KM	MARGIN
* AP260	260A	Tennille	GA	4.8	2.47	115.0	-112.53
* ALOPEN	260A	Tennille	GA	168.8	3.74	115.0	-111.26
* AP260	260A	Tennille	GA	22.2	4.39	115.0	-110.61
AD260	260A	Unadilla	GA	229.3	116.79	115.0	1.79
WMCD.C	261C2	Statesboro	GA	120.6	112.75	106.0	6.75
WAPW	259C	Atlanta	GA	301.4	172.22	165.0	7.22
WLOVFM	261A	Washington	GA	5.7	84.43	72.0	12.43
WFXMFM	261A	Forsyth	GA	270.1	98.88	72.0	26.88
WFXMFM	261A	Forsyth	GA	270.1	99.12	72.0	27.12
AD263	263A	Swainsboro	GA	137.7	58.77	31.0	27.77
WFXM.A	261A	Forsyth	GA	267.1	99.94	72.0	27.94
AD262	262A	Eatonton	GA	313.4	69.63	31.0	38.63
WMCD	261A	Statesboro	GA	120.6	112.74	72.0	40.74
WKSF	260C	Asheville	NC	1.0	272.08	226.0	46.08

\* Substitution of Channel 270A for Channel 260A at Tennille  
is proposed in this petition.

WILLIAM CULPEPPER & ASSOCIATES. INC.  
227 FARR'S BRIDGE ROAD GREENVILLE SC 29611

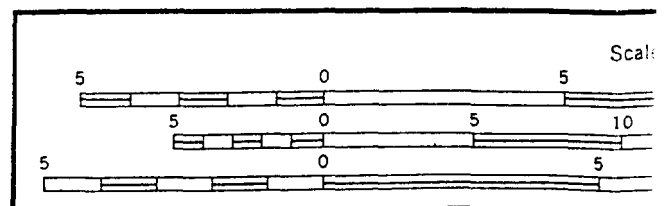
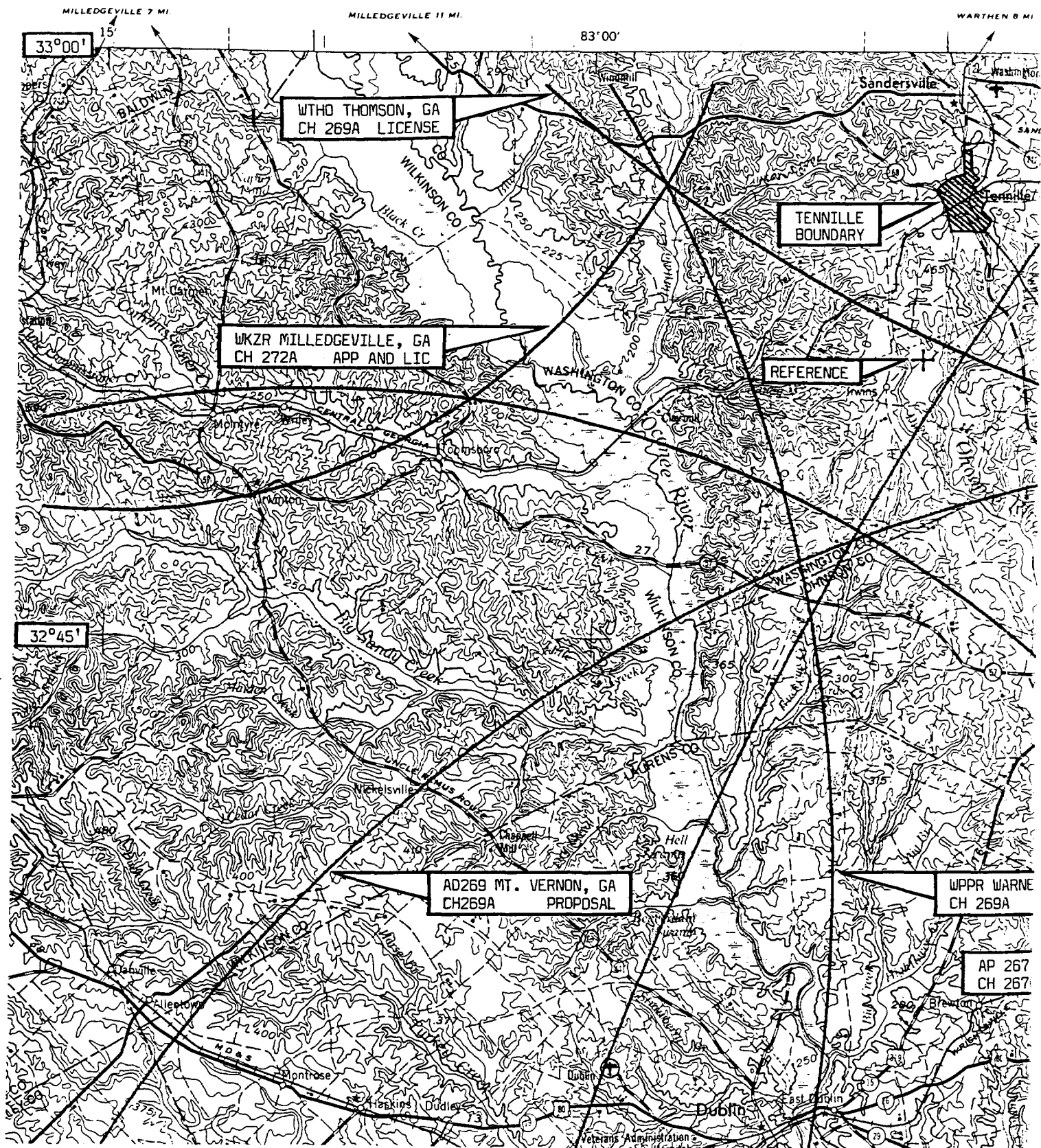
PROPOSED CHANNEL 270A SUBSTITUTION  
TENNILLE, GEORGIA

REFERENCE	CLASS A	DISPLAY DATES
32 52 10 N		DATA 02-28-91
82 49 52 W	Current rules spacings	SEARCH 04-03-91
----- CHANNEL 270 -101.9 MHz -----		

CALL	CH#	CITY	STATE	BEAR'	D-KM	R-KM	MARGIN
* WKTM	269A	Soperton	GA	152.4	55.56	72.0	-16.44
WTHOFM	269A	Thomson	GA	23.7	73.06	72.0	1.06
WZAT	271C	Savannah	GA	122.7	166.65	165.0	1.65
WPPR	269A	Warner Robins	GA	251.4	80.23	72.0	8.23
AP267	267C2	Chauncey	GA	207.3	63.52	55.0	8.52
AD269	269A	Mt Vernon	GA	158.9	81.26	72.0	9.26
WKZR	272A	Milledgeville	GA	301.1	45.77	31.0	14.77
WKZR.A	272A	Milledgeville	GA	301.1	45.77	31.0	14.77
AP267	267C2	Chauncey	GA	208.0	70.61	55.0	15.61
AP267	267C2	Chauncey	GA	201.9	71.43	55.0	16.43
ALOPEN	267C2	Chauncey	GA	201.2	71.61	55.0	16.61
ALOPEN	271A	Bolingbroke	GA	273.4	100.96	72.0	28.96
AP271	271A	Bolingbroke	GA	273.1	101.59	72.0	29.59
AP271	271A	Bolingbroke	GA	273.0	101.60	72.0	29.60
AP271	271A	Bolingbroke	GA	273.0	101.60	72.0	29.60
AP271	271A	Bolingbroke	GA	273.9	102.87	72.0	30.87
AD271	271C3	Crawford	GA	352.9	121.08	89.0	32.08
ALOPEN	273A	Warner Robins	GA	247.6	79.65	31.0	48.65

\* Substitution of Channel 291A for Channel 269A at Soperton is proposed in this Petition.





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